

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria**

**KEITH CARROLL,**

**Plaintiff,**

**v.**

**NORTHWEST FEDERAL  
CREDIT UNION (“Northwest FCU”)**

**Defendant.**

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**Civil No. 1:17-cv-01205-CMH-JFA**

**DEFENDANT’S MOTION TO DISMISS THE COMPLAINT**

Defendant Northwest Federal Credit Union, by its undersigned counsel, hereby moves this Court for an order dismissing the Complaint with prejudice, pursuant to Fed. R. Civ. P. 12(b)(6), for failure to state a claim upon which relief may be granted and pursuant to Fed. R. Civ. P. 12(b)(1) for want of jurisdiction. The grounds for this motion are set forth in the accompanying Memorandum of Law.

December 7, 2017

Respectfully submitted,

/s/ John M. Bredehoft

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***Counsel for Defendant***  
***Northwest Federal Credit Union***

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of December 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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